

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

-against-

OZ AFRICA MANAGEMENT GP, LLC,

Defendant.

Case No.: 1:16-cr-00515-NGG

**DECLARATION OF SAMANTHA LAWSON IN SUPPORT
OF DEFENDANT'S MEMORANDUM**

SAMANTHA LAWSON hereby declares, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a member of the Bar of this Court and of the firm of Cahill Gordon & Rein-
del LLP, counsel for OZ Africa Management GP, LLC and in the above-captioned action. I
submit this declaration upon my personal knowledge in support of Defendant's Memorandum.

2. Attached as Exhibit 1 is a true and correct copy of the Wall Street Journal article,
Och-Ziff Loans Financed Controversial Congo Deals by John Carreyrou, dated April 28, 2014,
available at: [https://www.wsj.com/articles/och-ziffs-african-oil-mining-deals-probed-
1398633905](https://www.wsj.com/articles/och-ziffs-african-oil-mining-deals-probed-1398633905).

3. Attached as Exhibit 2 is a true and correct copy of relevant pages of the Africo
Resources Limited Annual Information Form for the Fiscal Year Ended December 31, 2007, dat-
ed March 28, 2008, full document available at:
[https://www.sedar.com/GetFile.do?lang=EN&docClass=1&issuerNo=00024685&issuerType=03
&projectNo=01242473&docId=2164156](https://www.sedar.com/GetFile.do?lang=EN&docClass=1&issuerNo=00024685&issuerType=03&projectNo=01242473&docId=2164156).

4. Attached as Exhibit 3 is a true and correct copy of relevant pages of the Africo Resources Limited Notice of Annual and Special Meeting of Shareholders and Management Information Circular, dated May 14, 2008, full document available at:
<https://www.sedar.com/GetFile.do?lang=EN&docClass=10&issuerNo=00024685&issuerType=03&projectNo=01270248&docId=2207467>.

5. Attached as Exhibit 4 is a true and correct copy of relevant pages of the Africo Resources Limited Annual Information Form for the Fiscal Year Ended December 31, 2015, dated March 16, 2016, full document available at:
<https://www.sedar.com/GetFile.do?lang=EN&docClass=1&issuerNo=00024685&issuerType=03&projectNo=02455441&docId=3880097>.

6. Attached as Exhibit 5 is a true and correct copy of relevant pages of the Africo Resources Limited Annual Information Form for the Fiscal Year Ended December 31, 2012, dated March 20, 2013, full document available at:
<https://www.sedar.com/GetFile.do?lang=EN&docClass=1&issuerNo=00024685&issuerType=03&projectNo=02030032&docId=3290047>.

7. Attached as Exhibit 6 is a true and correct copy of relevant pages of the Africo Resources Limited Management Information Circular, dated May 15, 2012, full document available at:
<https://www.sedar.com/GetFile.do?lang=EN&docClass=10&issuerNo=00024685&issuerType=03&projectNo=01912389&docId=3127072>.

8. Attached as Exhibit 7 is a true and correct copy of relevant pages of the Rubicon Notice of Annual and Special Meeting of Shareholders and Management Information Circular, dated July 7, 2006, full document available at:

<https://www.sedar.com/GetFile.do?lang=EN&docClass=10&issuerNo=00009365&issuerType=03&projectNo=00963855&docId=1761036>.

9. Attached as Exhibit 8 is a true and correct copy of the Africo Resources Limited Resources, Interim Financial Statements, filed November 14, 2008, available at:

<https://www.sedar.com/GetFile.do?lang=EN&docClass=5&issuerNo=00024685&issuerType=03&projectNo=01343785&docId=2309722>.

10. Attached as Exhibit 9 is a true and correct copy of the Africo Resources Limited Press Release, dated April 27, 2007.

11. Attached as Exhibit 10 is a true and correct copy of the Africo Resources Limited Press Release, dated April 21, 2008.

12. Attached as Exhibit 11 is a true and correct copy of the Africo Resources Limited Press Release, dated June 11, 2008.

13. Attached as Exhibit 12 is a true and correct copy of the Africo Resources Limited Press Release, dated July 24, 2008.

14. Attached as Exhibit 13 is a true and correct copy of relevant pages of the Africo Resources Limited Annual Information Form for the Fiscal Year Ended December 31, 2009, dated March 24, 2010, full document available at:

<https://www.sedar.com/GetFile.do?lang=EN&docClass=1&issuerNo=00024685&issuerType=03&projectNo=01555555&docId=2614419>.

15. Attached as Exhibit 14 is a true and correct copy of the “Kalukundi-Mashitu Valuation Report” by SRK Consulting, prepared for Africo Resources Limited and Comide s.p.r.l., dated November 2008.

16. Attached as Exhibit 15 is a true and correct copy of the Eurasian Natural Resources Corporation PLC Press Release, dated August 20, 2010.

17. Attached as Exhibit 16 is a true and correct copy of relevant pages of the Africo Resources Limited Annual Information Form for the Fiscal Year Ended December 31, 2011, dated March 29, 2012, full document available at:

<https://www.sedar.com/GetFile.do?lang=EN&docClass=1&issuerNo=00024685&issuerType=03&projectNo=01881952&docId=3080581>.

18. Attached as Exhibit 17 is a true and correct copy of the Africo Resources Limited Press Release, dated December 31, 2012.

19. Attached as Exhibit 18 is a true and correct copy of the Africo Resources Limited Press Release, dated May 13, 2016.

20. Attached as Exhibit 19 is a true and correct copy of the Eurasian Resources Group Press Release, July 7, 2016.

21. Attached as Exhibit 20 is a true and correct copy of the Africo Resources Limited Early Warning Report, dated July 7, 2016.

22. Attached as Exhibit 21 is a true and correct copy of the Bloomberg Markets article, Miners Face Sudden Cost Increase After Congo Law Overhaul by William Clowes and Thomas Wilson, dated February 1, 2018, available at:
<https://www.bloomberg.com/news/articles/2018-01-31/congo-surprises-miners-with-last-minute-changes-to-legal-reforms>.

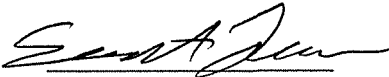
23. Attached as Exhibit 22 is a true and correct copy of relevant pages of the Africo Resources Limited Annual Information Form for the Fiscal Year Ended December 31, 2013, dated March 27, 2014, full document available at:

<https://www.sedar.com/GetFile.do?lang=EN&docClass=1&issuerNo=00024685&issuerType=03&projectNo=02184638&docId=3503536>.

24. Attached as Exhibit 23 is a true and correct copy of relevant pages of the Africo Resources Limited Annual Information Form for the Fiscal Year Ended December 31, 2014, dated March 23, 2015, full document available at:

<https://www.sedar.com/GetFile.do?lang=EN&docClass=1&issuerNo=00024685&issuerType=03&projectNo=02322870&docId=3698069>.

I hereby declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.


Samantha Lawson

March 2, 2018
New York, New York